

This comment is in response to the recommendations that the FCC pass new regulations that would require all VRS interpreters to hold a national certification through RID. While I believe RID certification is an appropriate and worthy goal of most interpreters, it is not the only measure of an interpreter's skill set. Our profession is deeply invested in producing highly qualified interpreters. For most interpreters, it takes many, many years to achieve a skill level that satisfies RID's standards. For that reason, there are several other assessment tools that interpreters subscribe to in order to appropriately evaluate their skills. Many states have devised their own set of evaluation tests. In addition, VRS providers have established internal testing and evaluation processes to monitor and increase the skill level of the interpreters that they employ. Forcing the industry to require national certification of all their interpreters would seriously handicap the system. The VRS industry depends on their ability to staff their call centers with an appropriate number of highly qualified interpreters to satisfy the needs of their deaf and hearing consumers. If the FCC passes this regulation, the number of interpreters that are available to work in this setting would decrease dramatically. In turn, this would lead to a limited capability of VRS providers to serve their consumers. Not only would the passing of this regulation have an impact on the many interpreters currently working for VRS without a national certification, it would also greatly reduce the quality of service received by the deaf consumer. I implore you to consider all sides of this argument before making a final decision. RID certification is a worthy goal of many interpreters, but it is in no way the only means available to assess a well-trained, highly skilled interpreter.